REMARKS

This communication is in response to the Office Action mailed on May 14, 2007. In that Office Action the Examiner considered the arguments of the February 28, 2007 amendment and reply and deemed that they were moot in view of the new ground for rejection. The Examiner rejected claims 1-41 under 35 U.S.C. § 102(b) as being anticipated by newly cited art by Lee et al. (U.S. Patent No. 6,430,731). Claims 1-41 are currently pending. Claims 1, 6, 11 19, 29 and 33 have been amended. No new matter has been added.

Rejections Under 35 U.S.C. § 102

Claims 1-41 were rejected under 35 U.S.C. § 102(b) as being anticipated by Lee et al. Applicant respectfully traverses.

Independent claim 1, as amended, now recites the following limitations (emphasis added):

selecting **one of the plurality of timing events as a worst case timing event based on at least a non-predetermined combination of an arrival time in the plurality of different arrival times and a slew in the plurality of different slews** of the plurality of timing events; and

storing information related to the worst-case timing event.

Applicant respectfully submits that Lee et al. fails to disclose each and every limitation of the present claims in a manner as recited therein. Lee et al. discloses a method and system for performing signal timing analysis on a circuit design. The technique for "**constructing a representative worst case signal**" having an arrival time and slew rate uses determined slew sensitivity values and signals propagated to a gate to construct the representative worst case

signal. See e.g., col. 3, lines 33-36, col. 4, line 50-col. 6, line 65, and col. 15 lines 28-52. The representative signal that is constructed and selected as a worst case signal is dictated by the circuit. See e.g., col. 15 lines 28-52. The set of representative worst case signals that can be constructed are based, in part, on the signals propagated to the inputs of a gate in the circuit design. See e.g., col. 6, lines 6-44 and col. 15 lines 28-52. While Lee et al. does disclose the implementation of a latest arrival method that selects a worst case signal from signals propagated to a gate in the circuit, the selection of the worst case signal in the late arrival method is only based on the arrival times of the signals propagated to the gate of the circuit. See e.g., col. 6, lines 26-35. There is no consideration or discussion explicit or implied of slew rate in the late arrival method. In short, the Lee et al. reference only discloses a technique that constructs representative worst case signals or selects a worst case signal from a group of signal purely based on the arrival times of the propagate signals in performing signal timing analysis.

In contrast, claim 1 now recites that the slew rate and arrival times of propagated signals are determined and a worst case signal is selected from these propagated signals based on a combination of a slew rate and arrival time. For at least these reasons, it is respectfully submitted that independent claim 1 is not anticipated by the Lee et al. reference.

For at least these same reasons, it is respectfully submitted that independent claims 6, 11, 19, 29 and 33 are likewise not anticipated by the cited references because they recite a limitation substantially similar to the limitation identified discussed with respect to claim 1 .

Since the remaining claims depend from these independent claims 1, 6, 11, 19, 29 and 33, respectively, these remaining dependent claims are also not anticipated and are therefore allowable over the cited references for the same reasons discussed above with respect to claim 1.
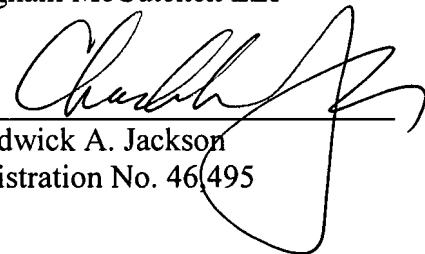
CONCLUSION

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. **50-4047,** referencing billing number **7017522001.** The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. **50-4047,** referencing billing number **7017522001.**

Respectfully submitted,

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Date: <u>September 14, 2007</u>

By: _____

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